

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

B.E. TECHNOLOGY, L.L.C.,

Plaintiff,

v.

FACEBOOK, INC.,

Defendant.

Civil Action No. 2:12cv2769 JPM-tmp

Hon. Jon Phipps McCalla

JURY DEMAND

**DECLARATION OF JEREMY JORDAN IN SUPPORT OF FACEBOOK'S MOTION
TO TRANSFER VENUE TO THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA**

I, Jeremy Jordan, hereby declare:

1. I am employed by Defendant Facebook, Inc. as a Litigation Paralegal and provide this declaration in support of Facebook's motion to transfer this action to the United States District Court for the Northern District of California. I declare that the following statements are true to the best of my knowledge, information, and belief, formed after a reasonable inquiry under the circumstances. If called upon to testify, I could and would competently testify thereto.

2. Facebook is a Delaware corporation with its headquarters and principal place of business in Menlo Park, California. Facebook moved to Palo Alto, California, in June 2004, just months after its initial launch in February 2004. From June 2004 to its move to Menlo Park in 2011, Facebook's headquarters and principal place of business was in Palo Alto. Both Menlo Park and Palo Alto are within the Northern District of California.

3. Facebook's management team and primary engineering facilities are located at its headquarters in Menlo Park. Nearly all of the highly proprietary information and source code

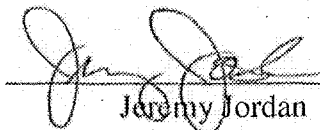
relating to the www.facebook.com website are stored in Facebooks' various data centers, which are accessible and ultimately managed from Menlo Park. The same is true for nearly all of the information related to Facebooks' general operations, marketing, financials, and customer service.

4. The vast majority of Facebook employees knowledgeable about the design, development, and operation of the www.facebook.com website are located at Facebook's Menlo Park headquarters.

5. One Facebook employee resides in Maryville, Tennessee, which is in the Eastern District of Tennessee. His title is Data Center Energy Manager, and he is part of Facebook's Infrastructure Team. As indicated by his title, this employee manages the energy supply arrangements for Facebook's data centers, and his job responsibilities are unrelated to the display of advertising on any Facebook website.

6. Facebook has no offices, facilities, or employees working in the Western District of Tennessee. I am aware of no relevant documents located in the Western District of Tennessee.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed in Menlo Park, California on this 9 day of January, 2013.



Jeremy Jordan